

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHIHAB AHMED SHIHAB SHIHAB,
a/k/a SHIHAB AHMED SHIHAB,
a/k/a SHIHAB AHMED,
a/k/a ABU AHMED,

Defendant.

CASE NO.

JUDGE

INFORMATION

18 U. S. C. § 2339A(a)

FORFEITURE ALLEGATION

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

1. The defendant, **SHIHAB AHMED SHIHAB SHIHAB**, a/k/a **Shihab Ahmed Shihab**, a/k/a **Shihab Ahmed**, a/k/a **Abu Ahmed**, is a citizen and national of Iraq and entered the United States in or around September 2020.

2. From at least December 2020 and continuing until May 2022, the defendant resided in whole or part in Columbus, Ohio, within the Southern District of Ohio.

COUNT 1

(Attempting to Provide Material Support to Terrorists)

3. Paragraphs 1 and 2 of the Introduction are incorporated herein.

4. On or about November 30, 2021, **SHIHAB** disclosed to INDIVIDUAL 1 that he wanted to smuggle into the United States at least four Iraqi nationals who were planning to kill former President George W. Bush, a United States national. **SHIHAB** stated that the Iraqi

nationals wanted to kill the former president because of their belief that he was responsible for killing many Iraqis and breaking apart the entire country of Iraq.

5. On or about January 13, 2022, **SHIHAB** told INDIVIDUAL 1 that he was part of a group overseas that supported the assassination of former President Bush. **SHIHAB** explained his role in the mission was to locate and conduct surveillance on former President Bush's residences and/or offices and obtain firearms and vehicles to be used in the assassination.

6. On or about February 7, 2022, **SHIHAB** traveled to Dallas, Texas, where he met with INDIVIDUAL 1 and further discussed the logistics and potential costs associated with the assassination and **SHIHAB's** desire to take videos of former President Bush's office and residence.

7. On or about February 8, 2022, **SHIHAB** and INDIVIDUAL 1 traveled to the former President's residence in Dallas, Texas. **SHIHAB** recorded videos of the front access gate and surrounding area leading into the neighborhood of the residence.

8. On or about February 8, 2022, **SHIHAB** and INDIVIDUAL 1 traveled to and walked around the George W. Bush Institute in Dallas, Texas. **SHIHAB** took video recordings of the library and office area during the visit. **SHIHAB** also discussed with INDIVIDUAL 1 acquiring firearms to be used in the assassination.

9. On or about March 2, 2022, **SHIHAB** met INDIVIDUAL 1 at a hotel room in Columbus, Ohio to look at sample firearms and law enforcement uniforms. **SHIHAB** took photographs of the firearms and uniform to send to his associates.

10. From in or about November 2021 and continuing until April 2022, in the Southern District of Ohio and elsewhere, the defendant, **SHIHAB AHMED SHIHAB SHIHAB, a/k/a Shihab Ahmed Shihab, a/k/a Shihab Ahmed, a/k/a Abu Ahmed**, knowingly attempted to provide material support and resources, to wit: services and property, including surveillance, weapons, uniforms, photographs and videos, and personnel, including himself, knowing and intending they were to be used in preparation for and in carrying out, a violation of Title 18, United States Code, Section 2332(b), conspiracy by persons outside the United States to kill a national of the United States.

In violation of Title 18, United States Code, Sections 2339A(a).

FORFEITURE ALLEGATION

11. The allegations of this Information are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(G) and 28 U.S.C. § 2461(c).

12. Upon conviction of the offense alleged in the Information, the defendant, **SHIHAB AHMED SHIHAB SHIHAB, a/k/a Shihab Ahmed Shihab, a/k/a Shihab Ahmed, a/k/a Abu Ahmed**, shall forfeit to the United States all assets acquired or maintained with the intent and for the purpose of supporting, planning, conducting, or concealing any act in violation of 18 U.S.C. § 2339A, and all assets derived from, involved in, or used or intended to be used to commit any such violation, including, but not limited to the following property seized during the investigation in this case:

- a. A Samsung Duos cellular telephone bearing no Serial Number or other identifying number, including its contents;
- b. A Samsung Galaxy S7 cellular telephone, IMEI 359470073230353, including its contents; and

- c. A black Samsung Model SM-S115DL(GP) cellular telephone,
IMEI 354229117677960, including its contents.

Forfeiture notice pursuant to 18 U.S.C. § 981(a)(1)(G), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

**KENNETH L. PARKER
UNITED STATES ATTORNEY**

Jessica W. Knight

**JESSICA W. KNIGHT (0086615)
Assistant United States Attorney
FRANK RUSSO (NY 2655348)
Trial Attorney**